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November 30, 2022

**VIA ECF**

The Honorable Edgardo Ramos  
Thurgood Marshall United States Courthouse  
40 Foley Square  
Courtroom 619  
New York, NY 10007

**Re: Consent Request for Adjournment of Premotion Conference in *Jacob v. Lorenz*, Case No. 1:21-cv-06807 (ER)**

Dear Judge Ramos:

We represent Defendants Taylor Lorenz and The New York Times Company (collectively, “Defendants”) in the above-referenced action. Pursuant to Your Honor’s Rule 1.E, we write to respectfully request an adjournment of the premotion conference currently set for December 15, 2022 to December 20, 2022.

After Plaintiffs filed their Second Amended Complaint (“SAC”) on October 5, 2022, Dkt. No. 28, Defendants filed a letter motion requesting a conference for their anticipated motion to dismiss pursuant to Your Honor’s Rule 2.A.ii on November 18, 2022, Dkt. No. 33. Plaintiffs filed their letter response on November 22, 2022, Dkt. No. 36. On November 28, 2022, this Court granted Defendants letter motion for a premotion conference and scheduled it for December 15, 2022 at 9:30 am. Dkt. No. 37.

Defendants respectfully seek a brief adjournment of the premotion conference until December 20, 2022. This adjournment is sought because undersigned counsel has oral argument in another case that conflicts with the time this Court has appointed for the premotion conference.

This is Defendants’ first request to adjourn the premotion conference. Defendants were previously granted a 30-day extension on October 14, 2022 to respond to Plaintiffs’ SAC, Dkt. No. 30, and a three-day extension on December 14, 2021 to respond to Plaintiffs’ First Amended Complaint due to undersigned counsel’s illness, Dkt. No. 15.

Plaintiffs’ counsel has consented to this request.

Respectfully submitted,  
Davis Wright Tremain LLP

A handwritten signature in blue ink, appearing to read "Katherine M. Bolger".

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cc: Counsel for Plaintiffs via ECF